

### **REMARKS**

Claims 1-49 are pending in the application. Claims 12, 15, 26-27, 33, 41, 45 and 49 are amended above to remove alternative language from the claims. The specification is amended to add section headings and the abstract is amended above as suggested by the examiner. No new matter has been added to the application by way of the above-identified amendment.

The examiner's specification and claim objections and rejections are overcome or they are traversed as set forth below.

#### **I. SPECIFICATION HEADINGS**

The specification is amended above to include the specification headings suggested by the examiner.

#### **II. THE ABSTRACT**

The abstract is amended above to use clear and concise language.

#### **III. THE SECTION 112, 2<sup>nd</sup> PARAGRAPH REJECTION**

The examiner's rejection of claims 12, 15, 26-27, 33, 41, 45 and 49 under 35 USC 112, second paragraph is overcome by amending each of the claims above to remove the objectionable alternative language "such as".

#### **IV. TRAVERSE OF THE ANTICIPATION REJECTION**

The examiner rejected claims 1-3, 11-13, 15-19, 25-27, 29-33, 35-36, 40-42, 45 and 47-49 for being anticipated by Holmes et al. (USP 6,230,009).

Holmes discloses a method and system for alerting a mobile station coupled to a first network that a communication request for the station appears on a second network. More specifically, Holmes teaches to track with network a mobile station is coupled to and then to translate address information to a format appropriate for sending alert messages to the mobile station via the second network. Examples of the networks are the standard wireless voice network and is a packet data network commonly referred to as CDPD (Cellular Digital Packet Data).

**A. Claims 1-3, 11-13, 15-19, 25-27 And 29 Are Novel**

Independent claims 1 and 17 and their respective dependent claims 2-3, 11-13, 15-16, 18-19, 25-27 and 29 are novel over Holmes et al. for several independent reasons. As an initial matter, Holmes et al. fails to teach the claim 1 and 17 feature of "connecting said nodes of at least two different wireless telecommunications network to a fixed network which comprises a server for storing the services and telecommunications parameters transmitted by base transceiver stations of said telecommunications network". The examiner refers to column 3, lines 10-17 of Holmes et al. and states that "connecting the nodes 201 to a fixed network VLR inherently includes a server for storing services and telecommunication parameters transmitted by the base transceiver (node) of the telecommunication network". However, VLR is a visitor location register common to the two networks. Holmes discloses that VLR store, for example as a flag, location information identifying that network on which the mobile station is camped on. In other words, Holmes et al. fails to teach that VLR is a "server for storing services and telecommunications parameters transmitted by base transceiver stations of said telecommunication networks".

Independent claims 1 and 17 and their respective dependent claims are also novel because Holmes fails to teach "said terminal making a service request through one of said nodes to said server" as claimed in claims 1 and 17. The examiner relies upon column 3, lines 17-21 of Holmes et al for disclosing this feature. However, column 3, lines 17-21 does not describe this claimed feature. Instead, column 3, lines 17-21 describes a mobile-terminating voice communication, wherein the MSC receives a voice communication request (incoming call) from a calling party. The MSC then checks the VLR for the location of the mobile station. The request described is not a service request sent by a mobile station through one of the nodes to the VLR ("the server").

Independent claims 1 and 17 and their respective independent claims also independently novel because Holmes et al. fails to teach "transmitting to the terminal the telecommunications parameters of the node providing the service according to the request", as claimed in claims 1 and 17. The examiner refers to column 3, lines 39-63 in Holmes as teaching this feature. However, column 3, lines 39-43 in Holmes describes that the mobile station connected to the packet data network receives a notice of communication request sent by the MSC of the wireless voice communication network. This notice is sent by the MSC in response to the incoming,

mobile-terminating voice call as explained above. The notice is not sent in response to a specific service request sent by the mobile station to a server or the VLR, and the notice does not include the telecommunication parameters of the node providing the service defined in such service request. Column 3, lines 44 to 63 in Holmes et al., describes an analogous operation when a mobile data intermediate system (MDIS) receives from an originating party packet communication which is addressed to a mobile station. The MSIS checks the VLS for the current location of the mobile station and sends a notification through the network where the mobile station is camped on. The mobile station then receives the notification. Again, the notification in Holmes et al. is not sent by a server or the VLR in response to a specific service request sent by the mobile station, and the notification does not contain telecommunications parameters of the node providing the services defined by such a service request.

For each of the above grounds, independent claims 1 and 17 and their respective dependent claims 2-3, 11-13, 15-16, 18-19, 25-27 and 29 are not anticipated by Holmes et al.

#### **B. Claims 30-33 and 35 Are Novel**

Independent claim 30 and dependent claims 21-33 and 35 are novel at least because Holmes et al. fails to teach a server which is arranged to store data and telecommunications parameters of the services supported by said nodes of the communications network, and which server is responsive to a service request sent by the terminal for transmitting the telecommunications parameters of at least one node providing the service or services according to the service request, as discussed above with regard to claim 1.

Holmes et al. further fails to teach that the terminal is able to establish a connection to said node on the basis of the parameters as set forth in the same claims. The examiner refers to column 3, lines 39-43 as teaching this feature. However, column 3, lines 39-43 in Holmes et al. only teaches that when the mobile station receives the notice of incoming call from the MSC, it can elect whether to camp on the wireless voice communication network to receive the call or to remain camped on the packet data communication network. There is no teaching that a terminal would send a service request to a server, receive from the server the telecommunications parameters of at least one node providing the services defined in such a service request, and establish a connection to said node on basis of the telecommunications parameters received in

reply to such a service request.

Claims 30-33 and 35 are novel for each above-identified grounds.

**C. Claims 36, 40-42, 45 And 47 Are Novel**

Independent claim 36 and dependent claims 40-42, 45 and 47 are novel at least because Holmes et al. fails to teach a terminal which is arranged to transmit a service request to a server which stores service data and telecommunications parameters supported by nodes of said at least two telecommunications network, and which terminal is arranged to configure itself and/or establish a connection to one of said nodes on the basis of the telecommunications parameters received from the said server, as discussed in Section IV(A & B) above with regard to independent claims 1, 17 and 30.

**D. Claims 48-49 Are Novel**

Independent claim 48 and dependent claim 49 are novel at least because Holmes et al. fails to teach a server of a wireless telecommunications network which contains software modules and parameter values of the wireless telecommunications network. To the contrary, as discussed above, Holmes teaches that the VLR stores location information of the mobile station. Holmes further fails to teach that an Internet protocol connection is established between the server and a wireless terminal through a second wireless telecommunications network.

A second and independent ground for novelty of claims 48-49 is because Holmes et al. fails to teach that the server provides to a wireless terminal a possibility to download over such Internet protocol connection, configuration software modules and parameter values with which the terminal configures itself to the radio interface of the wireless telecommunications network. Indeed, Holmes et al. fails to teach any kind of downloading from network elements, and particularly downloading of configuration software modules and parameter values. Therefore, claims 48-49 are novel and not anticipated by Holmes et al.

**V. TRAVERSE OF THE OBVIOUSNESS REJECTION**

The examiner rejected claims 4-6, 8-10, 14, 20-24, 37-39 and 42-44 for being unpatentable over Holmes et al. in view of St. Pierre et al. (USP 5,901,352).

As discussed in Sections IV(A&B) above, Holmes et al. fails to teach the subject matter of independent claims 1, 17, 30, and 36, upon which these claims refer. St.-Pierre et al. also fails to describe the same features of independent claims 1, 17, 30 and 36. Therefore, claims 4-6, 8-10, 14, 20-24, 37-39 and 42-44 are non-obviousness because the prior art when taken as a whole does not disclose or suggest every feature of these claims. It is not understood which claims the examiner refers to at page 9, line 3 of the Official Action. It is best understood, the applicants believe that the examiner is referring to only claims 23-24 and 39.

Further, as admitted by the Examiner, Holmes et al. fails to teach the parameters comprise defined connection quality parameters. The examiner refers to column 8, lines 3-15 in St.-Pierre et al. as teaching that a mobile terminal sends to a server for storing parameters that include quality parameters connections for services. St.-Pierre et al. discloses a main centralized database storing subscription, network, service, and location data associated with multiple communications network. Column 8, lines 3-15 in St.-Pierre et al. teaches that the main centralized database further comprises sub-databases for storing subscriber profile data, subscriber preference data, and the location data of a user.

There is no teaching that the centralized database would receive from a mobile station network-specific service definitions which comprise defined connection quality parameters for each service, and store said network-specific service definitions. St.-Pierre further fails to teach that the centralized database sends quality parameters of a network node to the mobile station in response to a specific service request received from the mobile station. Therefore, claims 4-5, 8-10, 14, 20-22, 37-38 and 43 are patentable over Holmes in view of St.-Pierre.

Regarding claims 23-24 and 39, the examiner states that column 3, lines 39-43 in Holmes also teaches that the terminal configures itself according to the parameters. However, as already discussed above, column 3, lines 39-43 only teaches that upon receiving a notice of incoming call or data, the mobile station can elect to camp on the wireless voice communication network or to remain camped on the packet data network. There is no teaching of configuring the mobile station based on the notice. Therefore, also these claims are unobvious in view of Holmes.

Claims 4-6, 8-10, 14, 20-24, 37-39 and 42-44 are also not obvious because there is no motivation for a person skilled in the art to apply teachings of St.-Pierre et al. in the system of Holmes et al. at the time of the invention. St.-Pierre attempts to avoid HLR and VLR based

subscriber data management in a multi-network environment, whereas Holmes et al. teaches to use VLR.

#### **VI. ALLOWABLE SUBJECT MATTER**

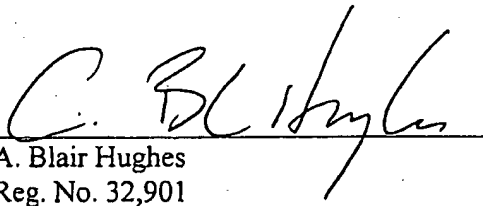
The applicant's acknowledge that the examiner has concluded that claims 7, 28, 34 and 46 constitute allowable subject matter and would be allowed if rewritten in independent form to include all of the features of the rejected base claim and any intervening claims.

#### **CONCLUSION**

Pending application claims 1-49 are believed to be patentable for the reasons indicated above. Favorable consideration and allowance of all pending application claims is courteously solicited.

Respectfully submitted,

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